

United States District Court
District of Massachusetts

Criminal Action No. 1:13-cr-10262-DPW

United States,

v.

Michael P. O'Donnell

Motion for Release on Bond

Now comes the defendant Michael O'Donnell and moves that this Court release him on bond pending a decision on his habeas motion. In support thereof, he states that he has a scheduled release date of April 23. However, following the April 2 hearing, it will likely take three weeks to return him to Fort Dix, the institution where he has been housed. The transportation issues will delay his release for possibly a month beyond his scheduled release date.

The defendant further states that he has at least a reasonable likelihood of succeeding on his 2255 motion, that he does not present a risk of flight, and that he does not present a danger to the community.

For all of these reasons, the defendant requests that this Court allow his motion.

Respectfully submitted,

Michael P. O'Donnell,

By his attorney,



Dana Alan Curhan

B.B.O. # 544250

45 Bowdoin Street

Boston, Massachusetts 02114

(617) 267-3800

dana.curhan@gmail.com

Certificate of Service

I hereby certify that I served this document upon counsel for the United States by filing the same through the ECF system, whereby they will be sent electronically to the registered participants as identified on the Notice of Electronic filing. There are no non-registered participants involved in this case.



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